



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jane G. Mattoon, Treasurer
Keep Our Majority Political Action Committee
(KOMPAC)
Post Office Box 20209
Alexandria, VA 22320

FEB 13 2002

Identification Number: C00307405

Reference: 12 Day Pre-Special Report (7/10/01-10/31/01)

Dear Ms. Mattoon:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 21(b) of your report discloses a payment(s) to another political committee(s) for goods and/or services provided by that committee(s). 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee was assessed the usual and normal charge for the goods and/or services you received and explain the steps the political committee(s) took in determining the amount(s) charged to you. If your committee was provided the goods and/or services at less than the

KEEP OUR MAJORITY POLITICAL ACTION COMMITTEE (KOMPAC)
PAGE 2

usual and normal charge, the difference between the two is considered to be an in-kind contribution by the political committee(s) to your committee and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the mailing address, date, amount and purpose of such payments as required by 11 CFR §104.9(b).

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each separate segregated fund and non-connected committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the FUNDS EXPENDED METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each two-year election cycle. 11 CFR §106.6(c)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category.

EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

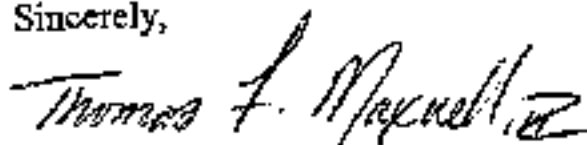
-Schedule B supporting Line 23 discloses a contribution(s) to a federal candidate(s) for the 2001 Arkansas Special Election (pertinent portions attached). Please provide the election designation in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

-Schedule B supporting Line 23 discloses a contribution(s) to a federal candidate(s) for the 2001 Florida Special Election (pertinent portions attached). Please provide the election designation in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

-Schedule B supporting Line 23 discloses a contribution(s) to a federal candidate(s) for debt retirement (pertinent portions attached). Please provide the designation (primary or general) that this contribution(s) should be attributed to.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Keep Our Majority PAC

Full Name (Last, First, Middle Initial)

A. Ernest Fletcher for Congress

Mailing Address

P.O. Box 4703

City
Lexington

State
KY

Zip Code
40544

Purpose of Disbursement

YTD:\$2,500.00

Candidate Name

Ernest Fletcher

011

Category/
Type

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

☒ Primary ☐ General
☐ Other (specify) ▼

State: KY

District: 6

Date of Disbursement

10 / 18 / 2001

Amount of Each Disbursement this Period

2500.00

Transaction ID: 4853418

Full Name (Last, First, Middle Initial)

B. Miller for Congress

Mailing Address

PO Box 100

City
Milton

State
FL

Zip Code
32572

Purpose of Disbursement

YTD:\$5,000.00 Contribution-Debt Reduction

Candidate Name

Jeff Miller

011

Category/
Type

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) ▼
FL Special

State: FL

District: 1

Date of Disbursement

10 / 18 / 2001

Amount of Each Disbursement this Period

2500.00

Transaction ID: 4853407

Contribution-Debt Reduction

Full Name (Last, First, Middle Initial)

C. Boozman For Congress

Mailing Address

PO Box 671

City
Rogers

State
AR

Zip Code
72757

Purpose of Disbursement

YTD:\$5,000.00 Contribution

Candidate Name

Mr. John Boozman

011

Category/
Type

Office Sought:

☒ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☒ Other (specify) ▼
AR Special

State: AR

District: 3

Date of Disbursement

10 / 18 / 2001

Amount of Each Disbursement this Period

5000.00

Transaction ID: 4853409

Contribution

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

10000.00

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (in Full)
Keep Our Majority PAC

Full Name (Last, First, Middle Initial) A. Mark Green for Congress		Date of Disbursement 10 / 10 / 2001	
Mailing Address P.O. Box 12571 City Green Bay State WI Zip Code 54307		Amount of Each Disbursement this Period 5000.00	
Purpose of Disbursement Voided Check Candidate Name Mark Green		Category Type 011	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ▼	Voided Check	
State: WI District: 8	Transaction ID: 4842058		

Full Name (Last, First, Middle Initial) B. Mark Green for Congress		Date of Disbursement 10 / 11 / 2001	
Mailing Address P.O. Box 12571 City Green Bay State WI Zip Code 54307		Amount of Each Disbursement this Period 5000.00	
Purpose of Disbursement YTD: \$5,000.00 Contribution Candidate Name Mark Green		Category Type 011	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ▼	Contribution	
State: WI District: 8	Transaction ID: 4842054		

Full Name (Last, First, Middle Initial) C. Miller for Congress		Date of Disbursement 10 / 11 / 2001	
Mailing Address PO Box 100 City Milton State FL Zip Code 32572		Amount of Each Disbursement this Period 2500.00	
Purpose of Disbursement YTD: \$2,500.00 Contribution-FL-Special Candidate Name Jeff Miller		Category Type 011	
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼ FL Special	Contribution-FL-Special	
State: FL District: 1	Transaction ID: 4842051		

TFM

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this five number only)

2500.00

